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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

:

V.

:

CRIMINAL NO. 22-CR-35-1

ANDREW WOLF

:

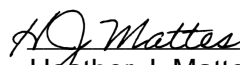
MOTION TO WAIVE DEFENDANT'S APPEARANCE

The defendant, Andrew Wolf, through Counsel, Arthur T. Donato and Heather J. Mattes, comes before this Honorable Court and states the following:

1. The Government filed a Motion for Restitution in the above matter and the co-defendant's Kray Strange, on June 20, 2023.
2. The Court has scheduled a restitution hearing for August 9, 2023.
3. On June 23, 2023, the Court ordered the Warden of Marianna FCI and United States Marshals to transport Wolf to the hearing and that he remain in the FDC Philadelphia until the proceedings were completed.
4. Mr. Wolf has instructed Counsel to waive his presence for the purpose of that hearing and does not want to be transferred.
5. The Government through AUSA Kelly Harrell has no objection to this relief.
6. Counsel for the codefendant has no objection to this relief.
7. Mr. Wolf's Attorney in fact is his father, a lawyer, Ronald Wolf. He will be present at the restitution hearing.

Wherefore, Mr. Wolf respectfully requests that this Motion be GRANTED and that the Court instruct the Warden and the United States Marshalls NOT to transport Andrew Wolf.

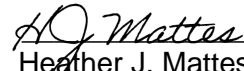
Respectfully submitted,



Heather J. Mattes
Attorney for Andrew Wolf

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all parties.


Heather J. Mattes
Attorney for Andrew Wolf